

WC 05-349

FCC/MELLON

DEC 16 2005

READ INSTRUCTIONS CAREFULLY  
BEFORE PROCEEDINGFCC/MELLON  
FEDERAL COMMUNICATIONS COMMISSION  
REMITTANCE ADVICE

DEC 16 2005

Approved by OMB

3060-0589

Page 1 of 2

(1) LOCK BOX #		SPECIAL USE ONLY	
SECTION A - PAYER INFORMATION			
(2) PAYER NAME (if paying by credit card enter name exactly as it appears on the card) <b>Cole, Raywid &amp; Braverman, L.L.P.</b>		(3) TOTAL AMOUNT PAID (U.S. Dollars and cents) <b>\$895.00</b>	
(4) STREET ADDRESS LINE NO. 1 <b>1919 Pennsylvania Ave., N.W.</b>			
(5) STREET ADDRESS LINE NO. 2 <b>Suite 200</b>			
(6) CITY <b>Washington</b>		(7) STATE <b>DC</b>	(8) ZIP CODE <b>20006</b>
(9) DAYTIME TELEPHONE NUMBER (include area code) <b>202-659-9750</b>		(10) COUNTRY CODE (if not in U.S.A.)	
FCC REGISTRATION NUMBER (FRN) REQUIRED			
(11) PAYER (FRN) <b>0003-7879-42</b>		[REDACTED]	
IF MORE THAN ONE APPLICANT, USE CONTINUATION SHEETS (FORM 159-C) COMPLETE SECTION BELOW FOR EACH SERVICE, IF MORE BOXES ARE NEEDED, USE CONTINUATION SHEET			
(13) APPLICANT NAME <b>Comcast Corp.</b>			
(14) STREET ADDRESS LINE NO. 1 <b>1500 Market Street</b>			
(15) STREET ADDRESS LINE NO. 2 <b>35th Floor, East Tower</b>			
(16) CITY <b>Philadelphia</b>		(17) STATE <b>PA</b>	(18) ZIP CODE <b>19102</b>
(19) DAYTIME TELEPHONE NUMBER (include area code)		(20) COUNTRY CODE (if not in U.S.A.)	
FCC REGISTRATION NUMBER (FRN) REQUIRED			
(21) APPLICANT (FRN) <b>0006-3292-47</b>		[REDACTED]	
COMPLETE SECTION C FOR EACH SERVICE, IF MORE BOXES ARE NEEDED, USE CONTINUATION SHEET			
(23A) CALL SIGN/OTHER ID	(24A) PAYMENT TYPE CODE <b>CUT</b>	(25A) QUANTITY <b>1</b>	
(26A) FEE DUE FOR (PTC) <b>\$895.00</b>	(27A) TOTAL FEE <b>\$895.00</b>	[REDACTED]	
(28A) FCC CODE 1		(29A) FCC CODE 2	
(23B) CALL SIGN/OTHER ID	(24B) PAYMENT TYPE CODE	(25B) QUANTITY	
(26B) FEE DUE FOR (PTC)	(27B) TOTAL FEE	[REDACTED]	
(28B) FCC CODE 1		(29B) FCC CODE 2	
SECTION D - CERTIFICATION			
CERTIFICATION STATEMENT I, <u>[Signature]</u> , certify under penalty of perjury that the foregoing and supporting information is true and correct to the best of my knowledge, information and belief.			
SIGNATURE <u>[Signature]</u>		DATE <u>12/16/05</u>	

FEDERAL COMMUNICATIONS COMMISSION  
REMITTANCE ADVICE (CONTINUATION SHEET)  
Page No. 2 of 2

USE THIS SECTION ONLY FOR EACH ADDITIONAL APPLICANT  
SECTION BB - ADDITIONAL APPLICANT INFORMATION

(13) APPLICANT NAME <b>Susquehanna Cable Company</b>		
(14) STREET ADDRESS LINE NO. 1 <b>140 East Market Street</b>		
(15) STREET ADDRESS LINE NO. 2		
(16) CITY <b>York</b>	(17) STATE <b>PA</b>	(18) ZIP CODE <b>17401</b>
(19) DAYTIME TELEPHONE NUMBER (include area code)		(20) COUNTRY CODE (if not in U.S.A.)

FCC REGISTRATION NUMBER (FRN) REQUIRED

(21) APPLICANT (FRN) <b>*0009728213</b>	
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COMPLETE SECTION C FOR EACH SERVICE, IF MORE BOXES ARE NEEDED, USE CONTINUATION SHEET

(23A) CALL SIGN/OTHER ID	(24A) PAYMENT TYPE CODE	(25A) QUANTITY
(26A) FEE DUE FOR (PTC)	(27A) TOTAL FEE	
(28A) FCC CODE 1		(29A) FCC CODE 2
(23B) CALL SIGN/OTHER ID	(24B) PAYMENT TYPE CODE	(25B) QUANTITY
(26B) FEE DUE FOR (PTC)	(27B) TOTAL FEE	
(28B) FCC CODE 1		(29B) FCC CODE 2
(23C) CALL SIGN/OTHER ID	(24C) PAYMENT TYPE CODE	(25C) QUANTITY
(26C) FEE DUE FOR (PTC)	(27C) TOTAL FEE	
(28C) FCC CODE 1		(29C) FCC CODE 2
(23D) CALL SIGN/OTHER ID	(24D) PAYMENT TYPE CODE	(25D) QUANTITY
(26D) FEE DUE FOR (PTC)	(27D) TOTAL FEE	
(28D) FCC CODE 1		(29D) FCC CODE 2
(23E) CALL SIGN/OTHER ID	(24E) PAYMENT TYPE CODE	(25E) QUANTITY
(26E) FEE DUE FOR (PTC)	(27E) TOTAL FEE	
(28E) FCC CODE 1		(29E) FCC CODE 2
(23F) CALL SIGN/OTHER ID	(24F) PAYMENT TYPE CODE	(25F) QUANTITY
(26F) FEE DUE FOR (PTC)	(27F) TOTAL FEE	
(28F) FCC CODE 1		(29F) FCC CODE 2

**COLE, RAYWID & BRAVERMAN, L.L.P.**

STEVEN J. HORVITZ  
DIRECT DIAL  
(202) 828 - 9828  
SHORVITZ@CRBLAW.COM

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2381 ROSECRANS AVENUE, SUITE 110  
EL SEGUNDO, CALIFORNIA 90245-4290  
TELEPHONE (310) 843-7099  
FAX (310) 643-7997

December 16, 2005

Federal Communications Commission  
Wireline Competition Bureau - CPD - 214 Appls.  
P.O. Box 358145  
Pittsburgh, PA 15251-5145

**Re: Joint International and Domestic Application of Susquehanna Cable Co. and Comcast Corporation for Authorization Pursuant to Section 214 of the Communications Act of 1934, as Amended, to Transfer International and Domestic Section 214 Authority and Certain Telecommunications Assets of Carmel Telephone Services, Inc. d/b/a SusCom**

Dear Sir or Madam:

Susquehanna Cable Co. and Comcast Corporation hereby submit one (1) original, five (5) copies, and one (1) stamp and return copy of the above-captioned application. Also enclosed are the completed Form 159, which authorizes the Commission to charge a credit card \$895 for the filing fee. A copy of this application is being filed simultaneously with the International Bureau.

Please contact the undersigned with any questions regarding this matter.

Sincerely yours,

Steven J. Horvitz

cc: Susan O'Connell, David Krech and Jodi Cooper, FCC International Bureau (via e-mail)  
Tracey Wilson-Parker, Renee Crittendon, FCC Wireline Competition Bureau (via e-mail)

**Before the  
Federal Communications Commission  
Washington, D.C. 20554**

In the Matter of the Application of

**SUSQUEHANNA CABLE CO.**

Transferor

and

**COMCAST CORPORATION**

Transferee

Application for Authorization Pursuant to Section  
214 of the Communications Act of 1934, as  
Amended, to Transfer International and Domestic  
Section 214 Authority and Certain  
Telecommunications Assets of Carmel Telephone  
Services, Inc. d/b/a SusCom

WB Docket No. \_\_\_\_\_

IB File No. \_\_\_\_\_

**APPLICATION**

Susquehanna Cable Co. ("Susquehanna") and Comcast Corporation ("Comcast") (collectively, "Applicants"), through their undersigned counsel, hereby request authorization pursuant to Section 214 of the Communications Act,<sup>1</sup> as amended, and Sections 63.04 and 63.24 of the Commission's rules,<sup>2</sup> to transfer control of certain telecommunications assets of Carmel Telephone Services, Inc. d/b/a SusCom ("SusCom") from Susquehanna to Comcast.

<sup>1</sup> 47 U.S.C. § 214.

<sup>2</sup> 47 C.F.R. §§ 63.04 and 63.24. This combined domestic and international 214 application is being filed pursuant to the Commission's new rules under Sections 63.04 and 63.24. See *Implementation of Further Streamlining Measures for Domestic Section 214 Authorizations*, Report and Order, CC Docket No. 01-150 (rel. Mar. 21 2002).

The proposed transaction will not result in a loss or impairment of service, and thus, this Application is being filed pursuant to Sections 63.24 and 63.04 of the Commission's rules.<sup>3</sup>

As set forth in detail below, Susquehanna and Comcast entered into an Asset Purchase Agreement dated October 31, 2005 ("Agreement") by which Susquehanna will sell to Comcast a variety of cable television and telecommunications assets, including broadband and telephone services, located in and around Carmel, New York. In addition, Applicants wish to transfer the international 214 authorization currently held by SusCom to an entity that will be a subsidiary of Comcast upon consummation of the transaction.

In support of this Application, Applicants state as follows:

**I. DESCRIPTION OF APPLICANTS**

**A. Susquehanna Cable Co.**

Susquehanna is a corporation organized and existing under the laws of the state of Pennsylvania with offices at 140 East Market Street, York, Pennsylvania 17401. Susquehanna operates advanced networks in six states serving approximately 225,000 customers. Susquehanna is a subsidiary of Susquehanna Media Co., which in turn is owned by Susquehanna Pfaltzgraff Co., a privately held corporation.

SusCom is a subsidiary of Susquehanna, which currently holds international 214 authority and provides telephone services in the Carmel, New York area.

**B. Comcast Corporation**

Comcast Corporation ("Comcast") is a publicly-traded company organized and existing under the laws of the state of Delaware, with offices at 1500 Market Street, 35<sup>th</sup> Floor, East Tower, Philadelphia, Pennsylvania 19102-2148. Comcast, through its

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<sup>3</sup> 47 C.F.R. §§ 63.04 and 63.18(e)(3). See *Implementation of Further Streamlining Measures for Domestic Section 214 Authorizations*, Report and Order, CC Docket No. 01-150 (rel. Mar. 21 2002).

operating subsidiaries provides cable television service, high-speed Internet service, and video programming and other services to millions of customers in 35 states and the District of Columbia.

## **II. DESCRIPTION OF THE TRANSACTION**

On October 31, 2005, Comcast and Susquehanna entered into the Agreement pursuant to which Comcast will acquire the cable and telecommunications assets held by Susquehanna and its subsidiaries (the "Transaction"). The Transaction will be consummated in the following steps:

- (1) On December 5, 2005, Susquehanna formed a new company, Comcast Phone of New York, LLC, a Delaware limited liability company;
- (2) Susquehanna will assign and transfer the telecommunications assets currently held by SusCom to Comcast Phone of New York, LLC;<sup>4</sup> and
- (3) Comcast, through its subsidiaries, will acquire all of the membership interests of Comcast Phone of New York, LLC.<sup>5</sup>

Steps (2) and (3) will occur contemporaneously. Thus, after the close of the Transaction, the telecommunications assets currently held by SusCom, and under the

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<sup>4</sup> This is a pro forma transaction as defined in 47 U.S.C. § 63.24(d).

<sup>5</sup> There are several intermediary companies in the corporate organization chart between Comcast Corporation and Comcast Phone of New York, LLC. Specifically, Comcast Phone II, LLC, a Delaware limited liability company, will hold a 100 percent interest in Comcast Phone of New York, LLC. Comcast Cable Communications, LLC, a Delaware limited liability company, holds a 100 percent interest in Comcast Phone II, LLC. Comcast Holdings Corporation, a Pennsylvania corporation, holds a 100 percent interest in Comcast Cable Communications, LLC. Comcast Corporation, a publicly-traded Pennsylvania corporation, holds 99.37 percent of the Class A Common Stock and 98.95 percent of the Class A Special Common Stock of Comcast Holdings Corporation; Sural LLC, a Delaware limited liability company, holds 100 percent of the Class B Common Stock and the remaining Class A and Class A Special Common Stock. Sural, LLC, in turn, is 100 percent held by Comcast Corporation.

control of Susquehanna, will be held by Comcast Phone of New York, LLC, and under the control of its ultimate parent entity, Comcast.

**III. APPLICANTS' REQUEST FOR STREAMLINED TREATMENT UNDER SECTIONS 63.03 AND 63.12 OF THE COMMISSION'S RULES**

For the reasons set forth below, Applicants respectfully submit that the requests for Section 214 authorization set forth herein qualify for treatment under the Commission's streamlined procedures set forth in Sections 63.03 and 63.12 of the Commission's rules.

**A. Request for Section 214 Authorization Pursuant to Section 63.24**

Applicants request authority to transfer certain New York telecommunications assets of SusCom to a subsidiary of Comcast. Applicants submit that Comcast has no affiliation with, and itself is not, a foreign carrier in any country in which it intends to provide service. Comcast therefore qualifies for a presumption of non-dominance under Section 63.10(a)(1) of the Commission's rules, 47 C.F.R. § 63.10(a)(1). Accordingly, this Application qualifies for streamlined processing pursuant to Section 63.12 of the Commission's rules.

**B. Request for Section 214 Authorization Pursuant to Section 63.04**

Applicants submit that the proposed transaction would result in Comcast and its affiliates having a market share in the interstate, interexchange market of less than 10 percent, and Comcast would provide competitive telephone exchange services or exchange access services exclusively in geographic areas served by a dominant local exchange carrier that is not a party to the transaction. Further, neither of the Applicants, nor their affiliates, are dominant with respect to any telecommunications service.

Accordingly, this Application qualifies for streamlined processing pursuant to Section 63.03 of the Commission's rules.

#### **IV. INFORMATION REQUIRED BY SECTION 63.24**

Applicants submit the following information in support of their request for Section 214 authorization pursuant to Section 63.24 of the Commission's rules:

(a) Name, address and telephone number of the Applicants

Transferor:  
Susquehanna Cable Co.  
140 East Market Street  
York, PA 17401  
Tel: (717) 852 - 2305  
FRN: 0009728213

Transferee:  
Comcast Corporation  
1500 Market Street, 35<sup>th</sup> Floor  
Philadelphia, PA 19102-2148  
Tel: (215) 665 - 1700  
FRN: 0006329247

(b) State of organization

Transferor: Susquehanna is organized under the laws of the state of Pennsylvania.

Transferee: Comcast is organized under the laws of the state of Pennsylvania.

(c) Contact persons

Questions or inquiries concerning this Application may be directed to:

Counsel for Susquehanna:

Craig W. Bremer  
Susquehanna Cable Co.  
140 East Market Street  
York, PA 17401  
Tel: (717) 852-2305  
E-mail [craig.bremer@suspfc.com](mailto:craig.bremer@suspfc.com)

Counsel for Comcast:

Steven J. Horvitz  
Cole, Raywid & Braverman, LLP  
1919 Pennsylvania Ave., NW, Ste. 200  
Washington, DC 20006  
Tel: (202) 659-9750  
E-mail [SHorvitz@crblaw.com](mailto:SHorvitz@crblaw.com)

(d) Section 214 authorizations.

Transferor: Susquehanna does not hold Section 214 authority. Susquehanna's subsidiary, SusCom, is authorized to provide domestic interstate common carrier services pursuant to blanket authority pursuant to Section 63.01 of the Commission's rules. In addition, SusCom has international 214 authority to provide global or limited global resale service. See File No. ITC-214-20040116-00017.



Transferee: Comcast is authorized to provide domestic interstate common carrier services pursuant to blanket authority pursuant to Section 63.01 of the Commission's rules. In addition, certain Comcast subsidiaries hold international 214 authority from the Commission and are further are duly authorized to provide facilities-based interexchange and/or long distance telecommunications services to residential and business customers in various portions of the United States, in all states except Alaska and Hawaii.

- (h) Comcast hereby certifies that the entities acquiring the designated subscriber lines and accounts will be indirectly-held, wholly-owned subsidiaries of Comcast and that no party other than Comcast (and its wholly-owned intermediate subsidiaries) will own a 10 percent or greater direct or indirect interest in the acquiring entities.
- (i) By the attached certification, Comcast certifies that it is not a foreign carrier, as defined in Section 63.09(d) of the Commission's rules. In addition, Comcast certifies that it is not affiliated with a foreign carrier within the meaning of Section 63.09(e) of the Commission's rules.
- (j) By the attached certification, Comcast certifies that it does not seek to provide international telecommunications services to any destination county to which paragraphs (j)(1) - (j)(4) of Section 63.18 of the Commission's rules apply.
- (k) Not applicable.
- (l) Not applicable.
- (m) Not applicable.
- (n) By the attached certification, Comcast certifies that it has not agreed to accept special concessions directly or indirectly from any foreign carrier with respect to any U.S. international route where the foreign carrier possesses market power on the foreign end of the route and will not enter into such agreements in the future.
- (o) By the attached certification, Comcast certifies, pursuant to Sections 1.2001 through 1.2003 of the Commission's Rules (implementing the Anti-Drug Abuse Act of 1988, 21 U.S.C. § 853a), that no party to the Application is subject to a denial of Federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1998.
- (p) Applicants submit that Comcast has no affiliation with, and itself is not, a foreign carrier in any country in which it intends to provide service. Comcast therefore qualifies for a presumption of non-dominance under

Section 63.10(a)(1) of the Commission's rules. Accordingly, this Application qualifies for streamlined treatment pursuant to Section 63.12 of the Commission's rules.

**V. INFORMATION REQUIRED BY SECTION 63.04**

With respect to Applicants' request for Section 214 authority pursuant to Section 64.03 of the Commission's rules to transfer certain telecommunications assets of SusCom to Comcast, attached hereto as Attachment 1 is the information required under paragraphs (a)(6) through (a)(12) of Section 63.04 of the Commission's rules.

## VI. CONCLUSION

For the reasons stated above, Applicants respectfully request that the public interest, convenience and necessity would be furthered by the grant of this Application.

By: 

Craig W. Bremer  
Susquehanna Cable Co.  
140 East Market Street  
York, PA 17401  
Tel: (717) 852-2305  
E-mail [craig.bremer@suspfz.com](mailto:craig.bremer@suspfz.com)

By: 

Respectfully submitted,

Steven J. Horvitz  
Cole, Raywid & Braverman, LLP  
1919 Pennsylvania Ave., NW, Ste. 200  
Washington, DC 20006  
Tel: (202) 659-9750  
E-mail [SHorvitz@crblaw.com](mailto:SHorvitz@crblaw.com)

Counsel for Susquehanna Cable Co. Counsel for Comcast Corporation

Dated: December 16, 2005

**Attachment 1**  
**Information Required by Section 63.04**

Pursuant to Section 63.04 of the Commission's rules, the information required under paragraphs (a)(6) through (a)(12) of the Commission's rules is provided below:

**(a)(6) Description of the Transaction**

The Transaction is described in Section II of this Application.

**(a)(7) Geographic Areas Affected**

Susquehanna is transferring to Comcast the facilities-based telecommunications operation of SusCom located in and around Carmel, New York. The following is a list of the communities in which SusCom's business is being transferred to Comcast:

<u>Franchise</u>	<u>County</u>	<u>Community Unit Id. No.</u>
Town of Beekman	Dutchess	NY 1454
Village of Brewster	Putnam	NY 1222
Town of Carmel	Putnam	NY 1099
Town of Kent	Putnam	NY 1200
Town of Patterson	Putnam	NY 1028
Town of Pawling	Dutchess	NY 1054
Village of Pawling	Dutchess	NY 1055
Town of Putnam Valley	Putnam	NY 1453
Town of Somers	Westchester	NY 1182
Town of Southeast	Putnam	NY 1221

Comcast currently does not offer telecommunications service in the Carmel, New York area.

**(a)(8) Application Is Qualified For Streamlined Processing**

Applicants submit that the proposed transaction would result in Comcast, and its affiliates, having a market share in the interstate, interexchange market of substantially less than 10 percent, and Comcast would provide competitive telephone exchange services or exchange access services (if at all) exclusively in geographic areas served by a

dominant local exchange carrier that is not a party to the transaction. Further, neither of the Applicants, nor their affiliates, are dominant with respect to any telecommunications service. Accordingly, this Application qualifies for streamlined processing pursuant to Section 63.03 of the Commission's rules.

**(a)(9) Identification of Other Applications Related to the Same Transaction**

In connection with the Transaction, on December 12, 2005, Applicants filed with the Commission a separate application to assign to an affiliate of Comcast CARS license number KB6013 (York, PA), which is held by York Cable Television, Inc., a subsidiary of Susquehanna. In addition, Applicants filed separate applications to assign to affiliates of Comcast the following **business radio licenses** held by subsidiaries of Susquehanna:

York Cable Television, Inc.  
WQA380 (York, PA)  
WPMF577 (Williamsport, PA)

SBC Cable Co.  
WPOZ439 (Olney, IL)  
WQI221 (DuQuoin, IL)

Carmel Cable Television, Inc.  
WNCA831 (Carmel, NY)  
WPBZ715 (Carmel, NY)

CASCO Cable Television, Inc.  
WPSN205 (Freeport, ME)

**(a)(10) Special Consideration**

Applicants do not request special consideration because neither Comcast nor SusCom is facing imminent business failure. However, Applicants are seeking streamlined processing so that they can complete the proposed transaction as soon as possible.

**(a)(11) Waiver Requests**

There are no separately filed waiver requests being sought in connection with the Transaction.

**(a)(12) Public Interest Statement**

By granting this application, the Commission will service the public interest, convenience and necessity by ensuring continuity of service to SusCom's customers and promoting competition in the domestic telecommunications services market.

Comcast is a proven industry leader in upgrading its broadband communications systems and continuously striving to provide its customers with the most innovative services and diverse programming available. Across these various service offerings, as explained in detail below, SusCom subscribers will greatly benefit from the new opportunities they will be provided upon completion of the Transaction.

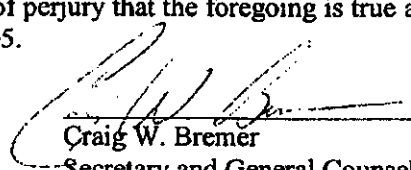
Comcast's experience in providing facilities-based telephone service to approximately 1.2 million customers is speeding the company's transition into digital telephony. In the past two years, Comcast has focused intently on preparing the launch of its new Internet protocol cable phone service, and has launched the service in over 20 markets during 2005. Comcast anticipates that it will have over 15 million households passed by the end of 2005 and over 1 million customers by the end of 2006. The service offers a full slate of traditional telephony features, including unlimited local and domestic long distance, international calling, popular calling features, E911, operator services, and directory assistance. Comcast Digital Voice service offering relies on Comcast's private managed network, rather than the public Internet, to ensure voice quality and reliability and to deliver features that rival or surpass traditional circuit-switched phone service. As

this new competitive alternative becomes established, Comcast intends to offer such innovations as television caller ID, voice activated dialing, video phone service, and unified messaging.

### **CERTIFICATION**

I, Craig W. Bremer, Secretary and General Counsel of Susquehanna Cable Co., hereby certify that the information in this attached application as it pertains to Susquehanna Cable Co. and Carmel Telephone Services, Inc. d/b/a SusCom is true and accurate to the best of my knowledge and that neither entity is subject to a denial of federal benefits pursuant to § 5301 of the Anti-Drug Abuse Act of 1988, 21 U.S.C. § 853a, as amended.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 16<sup>th</sup> day of December, 2005.



Craig W. Bremer  
Secretary and General Counsel  
Susquehanna Cable Co.

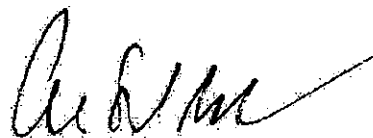


## CERTIFICATION

I, Arthur R. Block, Senior Vice President of Comcast Corporation ("Comcast") hereby certify that the information in this attached application as it pertains to Comcast and its subsidiaries is true and accurate to the best of my knowledge and that Comcast:

- (1) is not (a) a foreign carrier, as defined in Section 63.09(d) of the Commission's rules or (b) affiliated with a foreign carrier within the meaning of Section 63.09(e) of the Commission's rules;
- (2) does not seek to provide international telecommunications services to any destination country to which paragraphs (j)(1) – (j)(4) of Section 63.18 of the Commission's rules apply;
- (3) has not agreed to accept special concessions directly or indirectly from any foreign carrier with respect to any U.S. international route where the foreign carrier possesses market power on the foreign end of the route and will not enter into such agreements in the future; and
- (4) pursuant to Sections 1.2001 through 1.2003 of the Commission's Rules (implementing the Anti-Drug Abuse Act of 1988, 21 U.S.C. § 853a), is not subject to a denial of federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1998.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 15<sup>th</sup> day of December, 2005.



---

Arthur R. Block  
Senior Vice President  
Comcast Corporation